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**From:** DalSoglio, Julie [DalSoglio.Julie@epa.gov]  
**Sent:** 6/24/2015 3:52:07 PM  
**To:** Cirian, Mike [Cirian.Mike@epa.gov]; Parker, Robert [Parker.Robert@epa.gov]; Ketellapper, Victor [Ketellapper.Victor@epa.gov]; Vranka, Joe [vranka.joe@epa.gov]; Chalfant, Mark [Chalfant.Mark@epa.gov]; Wilder, Scott [Wilder.Scott@epa.gov]; Peterson, Cynthia [Peterson.Cynthia@epa.gov]  
**Subject:** FW: CFAC three week update June 24, 2015

FYI

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**From:** Benoit, John [mailto:JBenoit@mt.gov]  
**Sent:** Wednesday, June 24, 2015 8:20 AM  
**To:** Arrigo, John; jchambers@mt.gov; DalSoglio, Julie; Flatow, Jeni; Grimm, Deborah; mahall@mt.gov; Kurvink, Greg; Peterson, Lisa; Ponozzo, Kristi; Rieger, Michael; ethamke@mt.gov  
**Subject:** CFAC three week update June 24, 2015

All of the regulated material has been removed from the Rod Mill Building and the Asbestos program has received final air clearance data for this building from Mountain Consulting. The next building scheduled for active abatement of regulated asbestos material is the Paste Plant and conveyors associated with it.

On June 16<sup>th</sup> the program conducted a site visit for the purpose of site familiarization and to ensure regulatory compliance with the asbestos NESHAP, the Montana Code Annotated, and the Administrative Rules. Carl Burnham of IRS Environmental as well as his onsite Supervisor provided insight as to material location, building layout, and the scheduled removal dates. Currently seven accredited asbestos workers are on site, with an anticipated increase of up to sixty during later phases. Calbag is currently conducting removal of machinery within the Rectifier building which is done with project oversight by an IRS employee to address asbestos (non-regulated) identified in the asbestos inspection report. Asbestos containing waste material is being transported several times a week to the Flathead County landfill allowing the landfill to ensure proper coverage with clean fill as directed under the NESHAP. There are some discussions between IRS and the landfill regarding the best way to avoid overwhelming them in later phases as nearly 35 acres of roofing have been identified as non-regulated but still asbestos containing.

In regards to asbestos, no areas of non-compliance were noted.

Of special note to all future site visits, the Asbestos program would like to emphasize that significant physical hazards exist on site. With significant portions of the complex devoid of electrical service, the visibility is severely compromised and will require handheld lighting. In addition to lighting there are areas within the facility where open holes exist, fire suppression has been shut down, and communication is difficult. Some areas where Calbag employees are removing equipment (both inside and outside of buildings) will require the use of respiratory protection due to cutting of aluminum and other metallic components. Standard PPE including hardhat, vest, safety glasses, long sleeve shirt, steel toed boots, and leather gloves are required throughout the plant.

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*Please redirect all emails sent individually to this box to  
[DEQACPONLINE@mt.gov](mailto:DEQACPONLINE@mt.gov)*



## **DEQ Seeking Members for Asbestos Advisory Group**

Helena – The Montana Department of Environmental Quality is looking for members to serve on an Asbestos Advisory group.

With the passage of House Bill 434 during the 2015 Legislative session, DEQ was charged with organizing an Asbestos Advisory Group made up of stakeholders from a broad variety of interests in asbestos regulation.

The advisory group will advise DEQ on a variety of asbestos-related issues including: regulatory thresholds; permit applicability; public notice requirements; alternatives to permitting; scope of enforcement and cleanup authority; appropriate funding options; clarification of authority between state and federal laws; and workflow improvements.

DEQ is now accepting letters of interest for membership on the advisory group. Stakeholders may apply for one of twelve member categories that include asbestos professions, contractors, consultants, and environmental advocacy groups. A full description of the twelve member categories is outlined on DEQ's website here: <http://deq.mt.gov/asbestos/advisorygroup.mcp>

Letters of interest must specify a preferred member category and include a statement of qualifications. A resume is not required, but is encouraged. Letters of interest will be accepted until July 10, 2015 and may be submitted electronically. Member categories not appointed will remain open until filled.

For more information about the Asbestos Advisory Group, log on to group website at:

<http://www.deq.mt.gov/Asbestos/default.mcp> You may also contact the department by calling Bob Habeck at (406) 444-7305 or by e-mail at: [bbabeck@mt.gov](mailto:bbabeck@mt.gov)